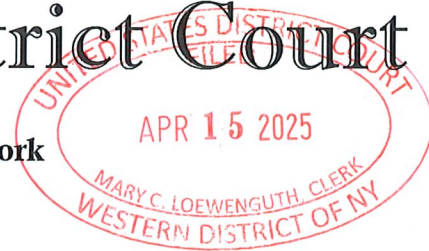


United States District Court

for the
Western District of New York



United States of America

v.

Case No. 25-mj-5099

PEDRO ALEXANDER COLINDRES- HERNANDEZ

Defendant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of April 10, 2025, in the County of Erie, in the Western District of New York, the defendant did knowingly commit the offense of possession of a forged, counterfeit, altered and falsely made alien resident card, in violation of Title 18, United States Code, Section 1546(a).

This Criminal Complaint is based on these facts:

☒ Continued on the attached sheet.

Michael Scioli

Complainant's signature

MICHAEL A. SCIOLI
SPECIAL OPERATION SUPERVISOR
UNITED STATES BORDER PATROL

Printed name and title

Sworn to before me and signed telephonically.

Date: April 15 2025

Michael J. Roemer

Judge's signature

City and State: Buffalo, New York

HONORABLE MICHAEL J. ROEMER
UNITED STATES MAGISTRATE JUDGE

Printed name and title

AFFIDAVIT

STATE OF NEW YORK)
COUNTY OF ERIE)SS:
CITY OF BUFFALO)

Michael A. Scioli , being duly sworn, deposes and says that:

1. I am a Border Patrol Agent with the United States Border Patrol ("Border Patrol"), and have been so employed for Twenty-two years. As a part of my duties, I have investigated violations of the Immigration and Nationality Act and violations of the United States Code, in particular, Title 8, United States Code, Section 1546(a), as it relates to aliens being found in the United States with fraud and misuse of visas, permits and other documents.

2. I make this Affidavit in support of the annexed Criminal Complaint charging PEDRO ALEXANDER COLINDRES-HERNANDEZ with a violation of Title 8, United States Code, Section 1546(a), being an alien found in the United States with fraud and misuse of visas, permits and other documents. The affidavit is based upon my own knowledge, my review of official records of the former Immigration and Naturalization Service ("INS") and current Immigration & Customs Enforcement ("ICE"), and upon information that I obtained from other law enforcement officers involved with this investigation. Because it is submitted for the limited purpose of obtaining a Criminal Complaint, I have not included every fact known to me concerning this investigation. I have set forth only facts that I believe are necessary to establish probable cause to demonstrate that Title 8, United States Code, Section 1546(a) has been violated by PEDRO ALEXANDER COLINDRES-HERNANDEZ.

3. On April 10th, 2025, at approximately 7:45 P.M., Buffalo Border Patrol Station Anti-Smuggling Unit (ASU) Agents were conducting plain clothes surveillance, when they spotted a White Chevrolet Express Van (Virginia license plate) in Hamburg, New York. ASU agents have arrested several illegal aliens with out of state plated vehicles working and living in the Hamburg, NY area over the past several months. Buffalo Sector Dispatch conducted record checks on the license plate. Record checks revealed that the registered owner is a Gilberto HERRERA MARTINEZ out of Virginia Beach, Virginia. Buffalo Sector dispatch also relayed that there was no match to the subject being a U.S. citizen, and that the individual had no Social Security number, no U.S. passport, and no information showing that he is a U.S citizen. It is a common trend for illegal aliens to register vehicles without providing a Date of birth and or Social Security card to hide their identify from law enforcement.

4. Agents spotted two individuals exit the white van and one subject stayed in the driver seat of the vehicle and did not leave the van. When the subjects returned to their van, Agents began to approach them to conduct an immigration inspection. As soon as agents identified themselves as Border Patrol Agents, two subjects jumped in the van and drove off from the parking lot. Agents were able to stop the third subject, identified as COLINDRES- HERNANDEZ, who was confirmed to be an illegal alien, who was born and is a citizen of Honduras, and was placed under arrest and transported to the Buffalo Border Patrol Station for further processing.

5. At the Buffalo Border Patrol Station, Border Patrol Agents conducted an inventory search of COLINDRES' property. Upon searching COLINDRES, a wallet was discovered in his pants pocket which contained numerous documents. Agents discovered a

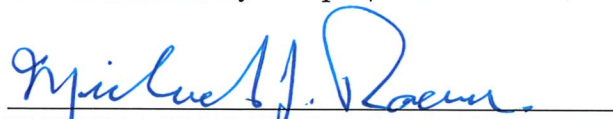
Social Security card and Lawful Permanent Resident card both displaying the name Pedro Alexander COLINDRES Hernandez. This name matched the valid Honduran Passport that COLINDRES presented to Border Patrol Agents. The Lawful Permanent Resident Card displayed a photograph of COLINDRES but stated he was born in Mexico. Record checks revealed that COLINDRES was never granted a Lawful Permanent Resident card or Social Security card and that these documents were fraudulent. Both the Social Security card and Lawful Permanent Resident card were seized as evidence.

6. Based on the foregoing, I have probable cause to believe that PEDRO ALEXANDER COLINDRES-HERNANDEZ, an alien, has illegally entered the United States at a time and place other than as designated by immigration officers and without inspection by immigration officers, with having forged or fraudulent U.S. documents on his person is in violation of Title 8, United States Code, Sections 1546 (a).



MICHAEL A SCIOLI
Special Operation Supervisor
United States Border Patrol

Subscribed and sworn to before me telephonically
on this 15th day of April, 2025.



HONORABLE MICHAEL J. ROEMER
United States Magistrate Judge